

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-224 (NEB/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MOTION TO UNSEAL**

QAMAR AHMED HASSAN, *et al.*,

Defendants.

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, Chelsea A. Walcker, Matthew S. Ebert, and Joseph S. Teirab, Assistant United States Attorneys, hereby moves the Court for an order to unseal the case, including the Indictment, in the above-referenced matter.

This motion is based upon the records and proceedings in this matter. Specifically, on September 13, 2022, the government requested that the Indictment be sealed because defendants had not yet been arrested and the public filing of these materials could alert the defendants and result in their flight and destruction of evidence. Defendants have now been apprehended, the government no longer has flight and destruction of evidence concerns, and thus unsealing is warranted.

Dated: September 19, 2022

Respectfully submitted,

ANDREW M. LUGER  
United States Attorney

BY: s/ Harry M. Jacobs  
HARRY M. JACOBS  
JOSEPH S. TEIRAB  
JOSEPH H. THOMPSON  
CHELSEA A. WALCKER  
MATTHEW S. EBERT  
Assistant U.S. Attorneys